



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

May 29, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: Kreider Manufacturing, Inc. 113-15806-00036

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

FNTVOP.wpd 8/21/02

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVOP.wpd 8/21/02



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Kreider Manufacturing, Inc.
405 Gerber Street
Ligonier, Indiana 46767**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T113-15806-00036	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 29, 2003 Expiration Date: May 29, 2008



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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary custom RV parts and granite sink top manufacturing plant.

Responsible Official:	President
Source Address:	405 Gerber Street, Ligonier, Indiana 46767
Mailing Address:	405 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	(260) 894-7121
SIC Code:	3713
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD
	Major Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) custom RV parts manufacturing process, consisting of the following:
 - (1) One (1) airless gel coat applicator identified as EU01, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (2) One (1) nonatomized resin/fiberglass applicator, identified as EU02, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (4) One (1) nonatomized resin/fiberglass applicator, identified as EU04, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (5) One (1) air atomized spray gun for painting plastic parts, identified as EU05, constructed after 1980, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (b) One (1) granite sink top manufacturing process, constructed in 2001, and consisting of the following:

- (1) One (1) gel matrix spray gun, identified as MT-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (2) One (1) pressure spray pot, identified as PP-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (3) One (1) final finish operation, identified as GTFF-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (4) Two (2) hand grinders for final finish operations, with a total maximum throughput rate of 275.52 pounds per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment, including one (1) acetylene welder, with a maximum capacity to weld 0.125 mild steel rods per hour. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Five (5) fiberglass hand-held grinders, each with a maximum PM/PM10 emissions of 0.10 pounds per hour. [326 IAC 6-3-2]
 - (2) One (1) Sears KR-002 band saw, with a maximum PM/PM10 emissions of 0.02 pounds per hour. [326 IAC 6-3-2]
 - (3) One (1) Delta KR-001 table saw, with a maximum PM/PM10 emissions of 0.02 pounds per hour. [326 IAC 6-3-2]
 - (4) One (1) belt/disc sander, with a maximum PM/PM10 emissions of 0.03 pounds per hour. [326 IAC 6-3-2]
 - (5) Six (6) hand grinders, each with a maximum PM/PM10 emissions of 0.1 pounds per hour. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document

is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

For IDEM, OAQ:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

For the Northern Regional Office:

Telephone Number: 1-800-753-5519, or

Telephone Number: 219-245-4870

Facsimile Number: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(8)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The

notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2(e)]
-
- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
-
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
-
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
-
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
-
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
-
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
-
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326

IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within forty-five (45) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within forty-five (45) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial forty-five (45) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.19 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

-
- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
 - (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
 - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
 - (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective

date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) custom RV parts manufacturing process, consisting of the following:
- (1) One (1) airless gel coat applicator identified as EU01, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (2) One (1) nonatomized resin/fiberglass applicator, identified as EU02, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (4) One (1) nonatomized resin/fiberglass applicator, identified as EU04, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (5) One (1) air atomized spray gun for painting plastic parts, identified as EU05, constructed after 1980, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds [326 IAC 8-6]

Pursuant to CP #133-2952-00036, issued on December 7, 1994, and revised by this Title V renewal permit (T113-15806-00036), use of resins and gel coats that contain styrene for this custom RV parts manufacturing process shall be limited such that the potential to emit VOC from use of such resins and gel coats only shall be less than 98 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

- (a) Monthly usage by weight, content of monomer that is VOC, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the VOC monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (b) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For VOC-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

The potential emissions of VOC from spray gun EU05 is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) are not applicable. Any change or modification which may increase the potential VOC emissions from spray gun EU05 to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

D.1.3 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the gel coat applicators EU01 and EU03, and the resin/fiberglass applicators EU02 and EU04 shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.11(a) is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in this subsection by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of approved emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be

calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.

- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.1.4 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.1.5 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.1.6 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate matter emissions from each of the airless gel coat applicators (EU01 and EU03), and the spray gun (EU05) shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC usage limit and the HAP monomer content limitations in conditions D.1.1 and D.1.3 shall be determined by one of the following:
 - (1) The manufacturer's certified product data sheet.
 - (2) The manufacturer's material safety data sheet.
 - (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (4) An alternate method approved by IDEM, OAQ.
- (b) Compliance with the VOC usage limitation contained in Conditions D.1.2 be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with Condition D.1.6, particulate from EU01, EU03 and EU05 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

- (a) Daily inspections shall be performed for applicators EU01, EU03, and EU05 to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Visible Emissions Notations

- (a) Weekly visible emission notations of the stack exhaust from EU01, EU03, and EU05 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1 and the HAP content limits in Condition D.1.3.
 - (1) The monomer content of each resin and gel coat.
 - (2) The monthly usage by weight of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total VOC emissions from resin and gel coat use for each month.
 - (5) The weight of the VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limit established in Condition D.1.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage for each month.
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (d) To document compliance with Conditions D.1.6 and D.1.10, the Permittee shall maintain a log of monthly overspray observations, daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) To document compliance with Condition D.1.11, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.3(a) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) granite sink top manufacturing process, constructed in 2001, and consisting of the following:
- (1) One (1) gel matrix spray gun, identified as MT-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (2) One (1) pressure spray pot, identified as PP-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (3) One (1) final finish operation, identified as GTFF-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (4) Two (2) hand grinders for final finish operations, with a total maximum throughput rate of 275.52 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The granite sink top manufacturing process is subject to 326 IAC 8-1-6. Pursuant to SSM# 133-14502-00036, issued on October 24, 2001 and 326 IAC 8-1-6, compliance with the requirements of 326 IAC 2-4.1-1 (MACT) in Condition D.2.2 has been determined to satisfy the requirements of BACT for this process.

D.2.2 New Source Toxics Control [326 IAC 2-4.1]

Pursuant to SSM #113-14502-00036, issued October 24, 2001, and the MACT determination under 326 IAC 2-4.1-1, operating conditions for the granite sink top manufacturing process shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall not exceed 36 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association,

July 23, 2001. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

- (b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

Type of Gel Coat or Resin	HAP Monomer Content, % by Weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.2.9(a) is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in this subsection by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of approved emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).

- (e) Cleaning operations for resin and gel coat application equipment shall meet the following:

- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
- (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

- (f) The work practice and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.2.3 shall be followed.

D.2.3 Emissions for Reinforced Plastics Composites Fabricating [326 IAC 20-25] [326 IAC 2-4.1-1]
Pursuant to SSM# 133-14502-00036, issued October 24, 2001, and 326 IAC 2-4.1-1 (MACT), the following work practice and training standards shall apply to the granite sink top manufacturing process:

- (a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

- (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.
 - (5) Clean-up rags with solvent shall be stored in closed containers.
 - (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
 - (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
- (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.2.4 Particulate Matter (PM) [40 CFR 52, Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52, Subpart P, the particulate matter emissions from each of the gel matrix spray gun (MT-1), the pressure spray pot (PP-1), and the final finish operation (GTFF-1) shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the hand grinders associated with the sink top manufacturing process shall not exceed 1.09 lbs/hr when the process weight rate is 275.52 lbs/hr. The pounds per hour limitation was calculated with the equation in (a).

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content and usage limitations in condition D.2.2 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (d) An alternate method approved by IDEM, OAQ.

D.2.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to SSM #113-14502-00036, issued October 24, 2001, and 326 IAC 6-3-2(d), particulate from the gel matrix spray gun (MT-1), the pressure spray pot (PP-1), and the final finish operation (GTFF-1) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Monitoring

- (a) Daily inspections shall be performed for Units MT-1, PP-1, and GTFF-1 to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.9 Visible Emissions Notations

- (a) Weekly visible emission notations of the stack exhausts from Units MT-1, PP-1, and GTFF-1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limit established in Condition D.2.2.
 - (1) The monomer content of each resin and gel coat used.
 - (2) The amount of resin and gel coat used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The total calculated HAP emissions for each month.
 - (5) The total HAP emissions for each compliance period.
 - (6) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.2.3 (b), the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Conditions D.2.4(a) and D.2.8, the Permittee shall maintain a log of monthly overspray observations, daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.2.9, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.2.2(b) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: (Insignificant Activities)

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment, including one (1) acetylene welder, with a maximum capacity to weld 0.125 mild steel rods per hour. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Five (5) fiberglass hand-held grinders, each with a maximum PM/PM10 emissions of 0.10 pounds per hour. [326 IAC 6-3-2]
 - (2) One (1) Sears KR-002 band saw, with a maximum PM/PM10 emissions of 0.02 pounds per hour. [326 IAC 6-3-2]
 - (3) One (1) Delta KR-001 table saw, with a maximum PM/PM10 emissions of 0.02 pounds per hour. [326 IAC 6-3-2]
 - (4) One (1) belt/disc sander, with a maximum PM/PM10 emissions of 0.03 pounds per hour. [326 IAC 6-3-2]
 - (5) Six (6) hand grinders, each with a maximum PM/PM10 emissions of 0.1 pounds per hour. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Manufacturing Processes), the allowable particulate emissions from each of the welding, grinding, and machining processes shall not exceed the allowable emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Kreider Manufacturing, Inc.
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: 113-15806-00036

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Kreider Manufacturing, Inc.
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: 113-15806-00036

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: Kreider Manufacturing, Inc.
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: 113-15806-00036
Facility: Coating Applicators EU01, EU02, EU03, EU04
Parameter: VOC emissions
Limit: Less than 98 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

VOC Emissions (ton/month) = Resin/Gelcoat Usage (tons/month) x Emission Factor

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Kreider Manufacturing, Inc.
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: 113-15806-00036
Facility: Emissions using resins or gel coats in the granite sink top manufacturing process.
Parameter: Total HAP emissions
Limit: Less than 36 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

HAP Emissions (ton/month) = Resin/Gelcoat Usage (tons/month) x Emission Factor

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Kreider Manufacturing, Inc.
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: 113-15806-00036

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Kreider Manufacturing, Inc.
Source Location: 405 Gerber Street, Ligonier, Indiana 46767
County: Noble
SIC Code: 3713
Operation Permit No.: 113-15806-00036
Permit Reviewer: ERG/YC

On March 19, 2003, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Krieder Manufacturing had applied for a Part 70 Operating Permit Renewal to operate a RV parts and granite sink top manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. For reinforced plastic parts manufacturing process, the size of parts could vary a great deal, and the amount of resin and gelcoat used is not proportional to the number of parts. IDEM, OAQ has determined to remove the information about the number of parts processed per hour for reinforced plastics composites parts manufacturing facilities. In addition, the gelcoat and applicators do not form a manufacturing line to produce the plastic parts. Therefore, IDEM, OAQ has made the following revisions to the unit description:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) custom RV parts manufacturing ~~process, line, with a maximum capacity of 8.7 RV parts per hour, and~~ consisting of the following:
 - (1) One (1) airless gel coat applicator identified as EU01, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (2) One (1) ~~nonatomized flow coat~~ resin/fiberglass applicator, identified as EU02, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, using

dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).

- (4) One (1) ~~nonatomized flow coat~~ resin/fiberglass applicator, identified as EU04, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (5) One (1) air atomized spray gun for painting **plastic parts**, identified as EU05, ~~with the maximum capacity to paint 2.61 RV parts per hour~~; constructed after 1980, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (b) One (1) granite sink top manufacturing **processline**, ~~with a maximum capacity of 2.05 sink tops per hour~~, constructed in 2001, and consisting of the following:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) custom RV parts manufacturing **processline**, ~~with a maximum capacity of 8.7 RV parts per hour~~, and consisting of the following:
 - (1) One (1) airless gel coat applicator identified as EU01, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (2) One (1) ~~nonatomized flow coat~~ resin/fiberglass applicator, identified as EU02, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (4) One (1) ~~nonatomized flow coat~~ resin/fiberglass applicator, identified as EU04, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (5) One (1) air atomized spray gun for painting **plastic parts**, identified as EU05, ~~with the maximum capacity to paint 2.61 RV parts per hour~~, constructed after 1980, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Volatile Organic Compounds [326 IAC 8-6]

Pursuant to CP #133-2952-00036, issued on December 7, 1994, and revised by this Title V renewal permit (T113-15806-00036), use of resins and gel coats that contain styrene for this custom RV parts manufacturing **processline** shall be limited such that the potential to emit VOC from use of such resins and gel coats only shall be less than 98 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit

shall be determined based upon the following criteria:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) granite sink top manufacturing ~~processline, with a maximum capacity of 2.05 sink tops per hour,~~ constructed in 2001, and consisting of the following:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The granite sink top manufacturing ~~processline~~ is subject to 326 IAC 8-1-6. Pursuant to SSM# 133-14502-00036, issued on October 24, 2001 and 326 IAC 8-1-6, compliance with the requirements of 326 IAC 2-4.1-1 (MACT) in Condition D.2.2 has been determined to satisfy the requirements of BACT for this process ~~line~~.

D.2.2 New Source Toxics Control [326 IAC 2-4.1]

Pursuant to SSM #113-14502-00036, issued October 24, 2001, and the MACT determination under 326 IAC 2-4.1-1, operating conditions for the granite sink top manufacturing ~~process line~~ shall be the following:

D.2.3 Emissions for Reinforced Plastics Composites Fabricating [326 IAC 20-25] [326 IAC 2-4.1-1]

Pursuant to SSM# 133-14502-00036, issued October 24, 2001, and 326 IAC 2-4.1-1 (MACT), the following work practice and training standards shall apply to the granite sink top manufacturing ~~processline~~:

D.2.4 Particulate Matter (PM) [40 CFR 52, Subpart P] [326 IAC 6-3-2]

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the hand grinders associated with the sink top manufacturing ~~processline~~ shall not exceed 1.09 lbs/hr when the process weight rate is 275.52 lbs/hr. The pounds per hour limitation was calculated with the equation in (a).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name:	Kreider Manufacturing, Inc.
Source Address:	405 Gerber Street, Ligonier, Indiana 46767
Mailing Address:	405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.:	113-15806-00036
Facility:	Emissions using resins or gel coats in the granite sink top manufacturing processline .
Parameter:	Total HAP emissions

Limit: Less than 36 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
HAP Emissions (ton/month) = Resin/Gelcoat Usage (tons/month) x Emission Factor

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

2. This source does not manufacture watercraft, therefore, IDEM, OAQ has removed the permit conditions relating to manufacturing of watercraft.

D.1.3 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.

(2) Production, specialty product resins from all sources.

~~(3) Tooling resins used in the manufacture of watercraft.~~

(34) Production resin used for Class I flame and smoke products.

3. For clarification purposes, IDEM, OAQ has made the following revisions:

D.1.3 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-53-3, the owners or operators of the gel coat applicators EU01 and EU03, and the resin/fiberglass applicators EU02 and EU04 shall comply with the provisions of the rule on or after January 1, 2002, including:

(a)

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in **this** subsection~~(b)~~ by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of **approved** emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

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D.1.10 Monitoring

(a) Daily inspections shall be performed for applicators **EU01, EU03, and EU05** to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.11 Visible Emissions Notations

(a) Weekly visible emission notations of the ~~fiberglass facilities'~~ stack exhausts **from EU01, EU03, and EU05** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.1.12 Record Keeping Requirements

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits ~~and/or the VOC emission limits~~ established in Condition D.1.2.

D.2.2 New Source Toxics Control [326 IAC 2-4.1]

(b)

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in **this** subsection~~(b)~~ by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of **approved** emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

D.2.8 Monitoring

- (a) Daily inspections shall be performed **for Units MT-1, PP-1, and GTFF-1** to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.9 Visible Emissions Notations

- (a) Weekly visible emission notations of the ~~fiberglass facilities'~~ stack exhausts **from Units MT-1, PP-1, and GTFF-1** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Kreider Manufacturing, Inc.
Source Location: 405 Gerber Street, Ligonier, Indiana 46767
County: Noble
SIC Code: 3713
Operation Permit No.: 113-15806-00036
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Kreider Manufacturing, Inc. relating to the operation of a custom RV parts and granite sink top manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) custom RV parts manufacturing line, with a maximum capacity of 8.7 RV parts per hour, and consisting of the following:
 - (1) One (1) airless gel coat applicator identified as EU01, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (2) One (1) flow coat resin/fiberglass applicator, identified as EU02, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (4) One (1) flow coat resin/fiberglass applicator, identified as EU04, constructed in 1978 and modified in 1998, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
 - (5) One (1) air atomized spray gun for painting, identified as EU05, with the maximum capacity to paint 2.61 RV parts per hour, constructed after 1980, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (b) One (1) granite sink top manufacturing line, with a maximum capacity of 2.05 sink tops per hour, constructed in 2001, and consisting of the following:

- (1) One (1) gel matrix spray gun, identified as MT-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (2) One (1) pressure spray pot, identified as PP-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (3) One (1) final finish operation, identified as GTFF-1, using dry filters for control, and exhausting to four (4) 21,470 acfm through-the-wall fans (identified as S/V-1, S/V-2, S/V-3, and S/V-4).
- (4) Two (2) hand grinders for final finish operations, with a total maximum throughput rate of 275.52 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new emission units or pollution control equipment during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Nine (1) heaters and one (1) air make-up units, with a total maximum heat input capacity of 3.35 MMBtu/hr.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment, including one (1) acetylene welder, with a maximum capacity to weld 0.125 mild steel rods per hour. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Five (5) fiberglass hand-held grinders, each with a maximum PM/PM10 emissions of 0.10 pounds per hour. [326 IAC 6-3-2]
 - (2) One (1) Sears KR-002 band saw, with a maximum PM/PM10 emissions of 0.02 pounds per hour. [326 IAC 6-3-2]
 - (3) One (1) Delta KR-001 table saw, with a maximum PM/PM10 emissions of 0.02 pounds per hour. [326 IAC 6-3-2]
 - (4) One (1) belt/disc sander, with a maximum PM/PM10 emissions of 0.03 pounds per hour. [326 IAC 6-3-2]

- (5) Six (6) hand grinders, each with a maximum PM/PM10 emissions of 0.1 pounds per hour. [326 IAC 6-3-2]
- (e) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) vertical resin storage tank, identified as EU06 and constructed in 1978, with a maximum capacity of 5,618 gallons and a maximum throughput of 99,483 gallons of resin per year.

Note: A boiler (B-1), a gasoline fuel transfer and dispensing operation, and solvent recycling systems were listed in the original Title V permit. The source stated that these units have been removed. Therefore, these units are not included in this renewal Title V permit.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Part 70 Permit 113-6053-00036, issued on March 31, 1998;
- (b) Exemption 113-9976-00036, issued on September 3, 1998;
- (c) First Administrative Amendment 113-10174-00036, issued on March 8, 1999;
- (d) First Significant Source Modification 113-14502-00036, issued on October 24, 2001; and
- (e) First Significant Permit Modification 113-14719-00036, issued on November 9, 2001.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) T113-6053-00036, issued on March 31, 1998:

Condition A.2 Emission Units and Pollution Control Equipment Summary:

- (5) One (1) air atomized spray gun, identified as EU05, constructed in 1978, with the maximum capacity to paint 2.61 RV parts per hour, with dry filters for control, exhausting to four (4) 21,470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (6) One (1) vertical resin storage tank, constructed in 1978, with a maximum capacity of 5618 gallons, identified as EU06. The throughput is 45,293 gallons per year of styrene.

Changes to original condition:

According to the Technical Support Document (TSD) for T113-6053-00036, issued on March 31, 1998, air atomized spray gun EU05 was constructed after 1980. Therefore, the 1978 was corrected and changed to "after 1980". The maximum throughput rate of the resin storage tank has been revised to 99,483 gallons of resin per year based on the information submitted by the Permittee on August 29, 2002. The VOC emissions from this storage tank are less than 1 ton per year, therefore, this resin storage tank is re-categorized as an insignificant unit in this renewal Part 70 Permit.

- (b) T113-6053-00036, issued on March 31, 1998 and CP113-2952-00036 issued on December 7, 1994:

Condition D.1.1 for Volatile Organic Compounds (VOC):

"Pursuant to CP #113-2952-00036, issued on December 7, 1994, the VOC input to EU01, EU02, EU03, EU04 and EU06 is limited to 8.25 tons of VOC per month, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the potential to emit of VOC to 99 tons per 365 consecutive day period. Compliance with this limit makes 326 IAC 8-6 not applicable."

Changes to original condition:

Since the resin storage tank (EU06) is an insignificant unit and has a potential to emit VOC less than 1 ton/yr, this VOC limit (reduced by 1 ton per year) will apply to the reinforced plastics composites coating applicators EU01, EU02, EU03, and EU04 only. This will simplify the records with no loss in compliance assurance. Also by limiting the processes the throughput to the storage tank will effectively be limited and the emissions can not exceed the 1 ton/yr allocated for it.

Condition 1.1 in T113-6053-00036, issued on March 31, 1998, limited the VOC input to the gel coat and fiberglass applicators. Since the gel coat and fiberglass applicators of the RV parts manufacturing line are considered reinforced plastics composites fabricating manufacturing processes, the emissions from these processes could be calculated based on the gel coat/resin usage and the "Unified Emission Factors for Opening Molding of Composites" by Composites Fabricators Association (CFA), dated July 23, 2001. These emissions factors have been approved by IDEM and are used to calculate the potential to emit of these gel coat/fiberglass applicators. Therefore, it is more appropriate to limit the use of resin and gel coat such that the potential to emit of VOC is less than 100 tons per year. Also, this is consistent with the standard language for processes subject to 326 IAC 2-4.1(MACT) for reinforced plastic composites.

In addition, the annual emission limit has been revised to be "per twelve (12) consecutive month period with compliance determined at the end of each month" instead of monthly or rolled on a daily basis limits. Therefore, the VOC limit for these units has been revised as follows:

"Pursuant to CP #133-2952-00036, issued on December 7, 1994, and revised by this Title V renewal permit (T113-15806-00036), use of resins and gel coats that contain styrene for this custom RV parts manufacturing line shall be limited such that the potential to emit VOC from use of such resins and gel coats only shall be less than 98 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

- (1) Monthly usage by weight, content of monomer that is VOC, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for

the VOC monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For VOC-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis."

- (c) First Significant Source Modification 113-14502-00036, issued on October 24, 2001:

Condition D.3.1 for Volatile Organic Compounds (VOC):

Pursuant to 326 IAC 8-1-6, the new granite top operation is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Pursuant to 326 IAC 8-1-6 (Best Available Control Technology), the input of VOC to the new granite top operation shall be limited to 36 tons per 12 consecutive month period. Compliance with this limit and the requirements of 326 IAC 2-4.1-1 (MACT) has been determined to satisfy the requirements of BACT.

Changes to original condition:

In Condition D.3.1 in SSM #133-14502-00036, issued on October 24, 2001, the VOC limit was based on the total VOC input. However, emissions from this operation are not equal to the VOC usage. Also, the requirements of D.3.2 (MACT requirements under 326 IAC 2-4.1) include a limit on the use of HAP such that the emissions do not exceed 36 tons per year of HAP. Therefore, in order to provide clarification and to make the language consistent with current standard language, the condition has been revised as follows.

"The granite sink top manufacturing line is subject to 326 IAC 8-1-6. Pursuant to SSM# 133-14502-00036, issued on October 24, 2001 and 326 IAC 8-1-6, compliance with the requirements of 326 IAC 2-4.1-1 (MACT) in Condition D.2.2 has been determined to satisfy the requirements of BACT for this process line.

Enforcement Issue

There are no enforcement actions pending.

The Title V renewal application was required to be submitted before June 30, 2002 (9 month prior to the date of expiration of the current TV permit), pursuant to 327 IAC 2-7-4(a)(1)(D). The Title V permit renewal application was received on June 27, 2002, before June 30, 2002, as required.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on June 27, 2002. Additional information was received on August 29, 2002 and February 5, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	69.5
PM-10	69.5
SO ₂	0.03
VOC	135.6
CO	4.36
NO _x	5.19

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	110.7
MMA	9.59
Ethyl Benzene	0.01
Cobalt	0.03
Toluene	0.04
Xylene	0.05
MEK	10.5
TOTAL	130.9

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	2
PM-10	2
SO ₂	0
VOC	14
CO	0
NO _x	0

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit After Issuance (tons/year)						
Process/Facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
4 Applicators EU01-EU04	Less than 8.63	Less than 8.63	-	Less than 98.0	-	-	98.0 for total HAPs
1 Spray Gun EU05	Less than 0.11	Less than 0.11	-	4.46	-	-	0.13
1 Gelcoat Applicator MT-1	Less than 3.11	Less than 3.11	-	Less than 36.0	-	-	Less than 36.0
NG Combustion Units (Insignificant)	0.11	0.11	0.01	0.08	1.23	1.47	Negligible
1 Welding Station (Insignificant)	Negligible	Negligible	-	-	-	-	Negligible
Grinding and Finish Operations	Less than 10.0	Less than 10.0	-	-	-	-	-
1 Resin Tank EU06 (Insignificant)	-	-	-	0.01	-	-	0.01
Total Emissions	Less than 22.0	Less than 22.0	0.01	*Less than 138.6	1.23	1.47	134.1 for total HAPs

* Note: The potential to emit VOC after issuance, which is based on the limitations in the permit, is greater than the potential to emit VOC calculated based on the process line information.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Noble County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The source does not have any spin wool fiberglass insulation manufacturing line. Therefore, the New Source Performance Standards for Wool Fiberglass Insulation Manufacturing Plants (40 CFR Part 60, Subpart PPP) are not applicable.
- (c) This source does not apply the surface coating to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) are not applicable.
- (d) The 8.5 MMBtu/hr boiler has a maximum heat input less than 10 MMBtu/hr. Therefore, the New Source Performance Standards for Small Industrial - Commercial - Institutional Steam generating Units (40 CFR 60, Subpart Dc) are not applicable.
- (e) The resin storage tank (EU06) at this source was constructed before 1980 and has a capacity less than 40 cubic meters (10,560 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60, Subpart Kb) are not applicable to this tank.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (g) The source manufactures products with thermoset resins and gel coats. Therefore, the proposed National Emission Standards for Hazardous Air Pollutants (NESHAPs) for

Reinforced Plastic Composites Production Facilities (40 CFR Part 63, Subpart WWWW) will most likely apply to this source. However, these standards were proposed on August 2, 2001 and have not been promulgated by the issuance of this Part 70 permit. Once this rule is promulgated by U.S. EPA, the Permittee shall submit a permit revision application to include the requirements of 40 CFR 63, Subpart WWWW in to this permit.

- (h) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.
 - (1) This rule requires the source to:
 - (A) Submit a Part 1 MACT Application by May 15, 2002; and
 - (B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.
 - (2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice challenged the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. The U.S. EPA and Earthjustice filed a settlement agreement on November 26, 2002. Proposed rule amendments based on this settlement agreement were published in the December 9, 2002 *Federal Register*. It appears that U.S. EPA intends to establish a phased schedule for promulgating all of the remaining MACT standards, resulting in four Part 2 MACT Application deadlines. Under the proposed amendments, some Part 2 MACT Applications would be due as early as May 15, 2003.
 - (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
 - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
 - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

- (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.
- (i) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. This source does not contain any units that require the use of a control device to achieve compliance with the representative emission limitations. Therefore, 40 CFR 64 is not applicable to any facilities contained therein.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not 1 of 28 source categories. This source was constructed in 1978 and modified in 2001. The potential to emit each criteria pollutant from the entire source is less than 250 ton per year. Therefore, this source is a minor PSD source currently and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Source Toxics Control)

The custom RV parts manufacturing line (EU01, EU02, EU03, EU04, and EU05) was constructed before July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this RV parts manufacturing line.

The granite sink top manufacturing line was constructed after July 27, 1997 and the HAP emissions from this sink top manufacturing line are greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are applicable to the granite sink top manufacturing line.

The source's specific MACT for the granite sink top manufacturing line has been determined in Significant Source Modification #133-14502-00036, issued October 24, 2001. Please see the section of "State Rule Applicability - The Granite Sink Top Manufacturing" for specific MACT requirements.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - The Custom RV Parts Manufacturing Line

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Noble County and the custom RV parts manufacturing line, consisting of EU01, EU02, EU03, and EU04, was constructed and started operating before January 1, 1980. Pursuant to CP#113-2952-00036, issued on December 7, 1994, revised by this Title V permit (T113-15806-00036), the total VOC emissions from coating applicators EU01, EU02, EU03, and EU04 shall not exceed 98 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-6 are not applicable. Pursuant to CP #133-2952-00036, issued on December 7, 1994, and revised by this Title V renewal permit (T113-15806-00036), use of resins and gel coats that contain styrene for this custom RV parts manufacturing line shall be limited such that the potential to emit VOC from use of such resins and gel coats only shall be less than 98 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

- (a) Monthly usage by weight, content of monomer that is VOC, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the VOC monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (b) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For VOC-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

Therefore, the requirements of 326 IAC 8-6 are not applicable.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The spray gun for painting (EU05) was constructed after January 1, 1980 and has the potential to emit VOC less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable. Any change or modification which may increase the potential VOC emissions from spray gun EU05 to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

The applicators EU01, EU02, EU03, and EU04 were constructed before January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these applicators.

326 IAC 8-2 (Surface Coating Emission Limitations)

The gel coat and flow coat applicators (EU01, EU02, EU03, and EU04) of the RV parts manufacturing line are not covered by one of the surface coating operations regulations in 326 IAC 8-2-2 through 326 IAC 8-2-13. Therefore, the requirements of 326 IAC 8-2 are not applicable to these coat applicators.

326 IAC 20-25 (Reinforced Plastics Composites Fabricating Emission Units)

This source manufactures reinforced plastics composites parts and has the potential to emit 10 tons/yr of any single HAP and 25 tons/yr of total HAPs. Therefore, this source is subject to the requirements of 326 IAC 20-25.

Pursuant to 326 IAC 20-25-3, the owners or operators of the gel coat applicators (EU01 and EU03), and the resin/fiberglass applicators (EU02 and EU04) shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).

- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

326 IAC 6-3-2 (Process Operations)

- (a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the airless gel coat applicators (EU01 and EU03) and the spray gun (EU05) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the gel coat applicators (EU01 and EU03) and the spray gun (EU05) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Flow coat applicators EU02 and EU04 do not emit any particulate matters, therefore, the requirements of 326 IAC 6-3-2 are not applicable to EU02 and EU04.

State Rule Applicability - The Graphite Sink top Manufacturing Line

326 IAC 2-4.1 (New Source Toxics Control)

The granite sink top manufacturing line was constructed after July 27, 1997 and HAP emissions from this manufacturing line are greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are applicable to the granite sink top manufacturing line.

Pursuant to SSM #133-14502-00036, issued October 24, 2001, and 326 IAC 2-4.1-1, the MACT standards for the granite sink top manufacturing line have been determined to be as follows:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 36 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

Type of Gel Coat or Resin	HAP Monomer Content, % by Weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category
 E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
 Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

- (c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).

- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (e) Cleaning operations for resin and gel coat application equipment shall meet the following:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (f) The work practice and training standards required pursuant to 326 IAC 20-25 shall be followed.

326 IAC 20-25 (Reinforced Plastics Composites Fabricating Emission Units)

This source manufactures reinforced plastics composites parts and has the potential to emit 10 tons/yr of any single HAP and 25 tons/yr of total HAPs. Therefore, this source is subject to the requirements of 326 IAC 20-25.

Pursuant to 326 IAC 20-25-1(b), in the event there is a conflict between this rule and any existing federal or state rule, the more stringent requirement shall apply. The MACT requirements applied to the graphite sink top manufacturing line are the more stringent requirements than the emission standards in 326 IAC 20-25-3. Therefore, this graphite sink top manufacturing line shall comply with emission standards defined in MACT. However, the MACT for this sink top manufacturing line also requires the source to comply with the work practice and training standards defined in 326 IAC 20-25.

Pursuant to 326 IAC 20-25-3(a), the graphite sink top manufacturing line shall comply with the work practice standards and operator training requirements under the provision of 326 IAC 20-25 on or after January 1, 2002, including:

- (a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
 - (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.
 - (5) Clean-up rags with solvent shall be stored in closed containers.
 - (6) Closed containers shall be used for the storage of the following:

- (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
- (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

326 IAC 8-1-6 (Volatile Organic Compounds (VOC))

The granite sink top manufacturing line was constructed after January 1, 1980 and has the potential to emit of VOC greater than 25 tons/yr. Therefore, the granite sink top manufacturing line is subject to the requirements of 326 IAC 8-1-6, which requires to control VOC emissions with the Best Available Control Technology (BACT).

Pursuant to SSM# 133-14502-00036, issued on October 24, 2001 and 326 IAC 8-1-6, compliance with the requirements of 326 IAC 2-4.1-1 (MACT) for this manufacturing line has been determined to satisfy the requirements of BACT for this process line.

326 IAC 6-3-2 (Process Operations)

- (a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from the gel matrix spray gun (MT-1), the pressure spray pot (PP-1), and the final finish operation (GTFF-1) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the gel matrix spray gun MT-1, the pressure spray pot PP-1, and the final finish operation GTFF-1 shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the hand grinders associated with the sink top manufacturing line shall be not exceed 1.09 lbs/hr when the process weight rate is 275.52 lbs/hr. The pounds per hour limitation was calculated with the equation in (a).

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the welding, grinding, and machining processes shall be limited by the pounds per hour limit calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per

hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, welding operations which consume less than 625 pounds of wire per day are exempted from this rule. The welding operations at this source would meet that exemption.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The source is not located in Clark, Floyd, Lake, or Porter County and the resin storage tank (EU06) was constructed before October 1, 1995. Therefore, 326 IAC 8-9-1 does not apply to this resin storage tank.

326 IAC 6-4 (Fugitive Dust Emissions)

The paved and unpaved roads at this source generate fugitive dust and are subject to 326 IAC 6-4. Pursuant to 326 IAC 6-4, the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

The major pollutants from this source are VOC and HAPs. None of the coating applicators at this source has more than 40% of total potential to emit VOC or HAPs from the entire source. The compliance methods for the major pollutants (VOC and HAPs) are the emission calculations based on the actual resin/gel coat usages and the "Unified Emission Factors for Open Molding of Composites". These emission factors were published by Composites Fabricators Association on July 23, 2001 and have been used by the U.S. EPA and IDEM, OAQ to calculate emissions from these types of sources. Because no one emission unit contributes more than 40% of the total VOC or HAP from the entire source and because the method used to calculate emissions is such a widely accepted method, testing will not be required.

In addition, the resin and gel coat application operations at this are all vented to the atmosphere through building ventilation. Therefore, it would be very difficult to isolate and enclose one coating application to conduct accurate testing. Testing was not required in the previous Part 70 Permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Gel coat applicators EU01 and EU03, spray gun EU05, gel matrix spray gun MT1, pressure spray pot PP-1, and final finish operation GTFF-1 have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
 - (d) Visible emissions notations of the stacks exhausts of the fiberglass facilities shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the dry filers must function properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 40 CFR 52, Subpart P.

Conclusion

The operation of this custom RV parts and granite sink top manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T113-15806-00036.

Appendix A: Emission Calculations
Reinforced Plastics and Composites Open Molding Operations
VOC and PM/PM10 Emissions
Custom RV Manufacturing Line (EU01, EU02, EU03, and EU04)

Company Name: Kreider Manufacturing, Inc.
Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767
Title V: 113-15806-00036
Reviewer: ERG/YC
Date: September 3, 2002

Unit ID	Application Method	Coatings	Density (Lb/Gal)	Weight % VOC	Maximum Usage (lbs/hr)	*VOC Emission Factor (lb/ton)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	**PM/PM10 Potential (lb/hr)	**PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
EU01	Gelcoat Application (airless spray guns)	5778W90087 (Gelcoat)	11.10	35.3%	30.33	337	5.11	122.65	22.38	4.91	21.50	75%	80%	0.98	4.30
EU02	Mechanical Non-Atomized (flow coater)	H834-RLC-20 (Resin)	9.18	35.0%	104.25	77	4.01	96.33	17.58	0.00	0.00	100%	0%	0.00	0.00
EU03	Gelcoat Application (airless spray guns)	5778W90087 (Gelcoat)	11.10	35.3%	30.33	337	5.11	122.65	22.38	4.91	21.50	75%	80%	0.98	4.30
EU04	Mechanical Non-Atomized (flow coater)	H834-RLC-20 (Resin)	9.18	35.0%	104.25	77	4.01	96.33	17.58	0.00	0.00	100%	0%	0.00	0.00
		Catalyst	9.70	60.0%	3.97	1200	2.38	57.12	10.42	0.00	0.00	100%	80%	0.00	0.00
Total							20.63		90.35		43.01				8.60

* Emission factors for gelcoat and resin are sum of the emission factors for styrene and MMA in page 2 of TSD Appendix and the unit is pounds per ton resin/gel coat processed.

The VOC emission factor for catalyst = 2000 lb/ton x Weight % VOC, assuming that all the VOCs contained in the catalyst evaporate.

** Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Potential VOC (lbs/hr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

Potential VOC (lbs/day) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 24 hr/day

Potential VOC (tons/yr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs

Potential PM/PM10 (lbs/hr) = Max. Usage (lbs/hr) x (1- Weight % VOC) x (1-Transfer Efficiency)

Potential PM/PM10 (tons/yr) = Max. Usage (lbs/hr) x (1- Weight % VOC) x (1-Transfer Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) x (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 lbs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Reinforced Plastics and Composites Open Molding Operations
HAPs Emissions
Custom RV Manufacturing Line (EU01, EU02, EU03, and EU04)

Company Name: Kreider Manufacturing, Inc.
Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767
Title V: 113-15806-00036
Reviewer: ERG/YC
Date: September 3, 2002

Unit ID	Application Method	Coatings	Density (Lb/Gal)	Maximum Usage (lbs/hr)	Weight % Styrene	*Emission Factor for Styrene (lbs/ton)	PTE of Styrene (tons/yr)	Weight % MMA	*Emission Factor for MMA (lbs/ton)	PTE of MMA (tons/yr)	Weight % MEK	*Emission Factor for MEK (lbs/ton)	PTE of MEK (tons/yr)
EU01	Gelcoat Application (airless spray guns)	5778W90087 (Gelcoat)	11.10	30.33	31.07%	277	18.37	4.18%	60	3.99	0.00%	0	0.00
EU02	Mechanical Non-Atomized (flow coater)	H834-RLC-20 (Resin)	9.18	104.25	35.00%	77	17.58	0.0%	0	0.00	0.0%	0	0.00
EU03	Gelcoat Application (airless spray guns)	5778W90087 (Gelcoat)	11.10	30.33	31.07%	277	18.37	4.18%	60	3.99	0.00%	0	0.00
EU04	Mechanical Non-Atomized (flow coater)	H834-RLC-20 (Resin)	9.18	104.25	35.00%	77	17.58	0.0%	0	0.00	0.0%	0	0.00
		Catalyst	9.70	3.97	0.00%	0	0.00	0.0%	0	0.00	60.0%	1200	10.42
Total							71.89			7.97			10.42

* Emission factors for resin and gelcoat are based on "Unified Emission Factors for Opening Molding of Composites" (Jul 23, 2001) and the unit is pounds per ton resin/gel coat processed.

The emission factor for catalyst = 2000 lb/ton x Weight % HAP, assuming that all the HAPs contained in the catalyst evaporate.

Total Potential to Emit HAPs =

**90.29
tons/yr**

METHODOLOGY

HAPs emission rate (tons/yr) = Max. Usage (lbs/hr) x 8760 hr/yr x 1 ton/2000 lbs x Emission Factor (lb/ton) x 1 tons/2000 lbs

Appendix A: Emission Calculations
Reinforced Plastics and Composites Open Molding Operations
VOC and PM/PM10 Emissions
Granite Sink Top Manufacturing Line (MT-1)

Company Name: Kreider Manufacturing, Inc.
Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767
Title V: 113-15806-00036
Reviewer: ERG/YC
Date: September 3, 2002

Unit ID	Application Method	Coatings	Density (Lb/Gal)	Weight % VOC	Maximum Usage (lbs/hr)	*VOC Emission Factor (lb/ton)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	**PM/PM10 Potential (lb/hr)	**PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
MT-1	Gelcoat Application (airless spray guns)	Marble Gel Coat	9.90	47.30%	19.69	584	5.75	137.96	25.18	2.59	11.36	75%	80%	0.52	2.27
	Gelcoat Application (airless spray guns)	Gelcoat	10.00	38.00%	6.15	387	1.19	28.56	5.21	0.95	4.18	75%	80%	0.19	0.84
	Mechanical Atomized (spray guns)	Laminating Resin	10.80	33.50%	38.52	119	2.28	54.78	10.00	0.00	0.00	100%	80%	0.00	0.00
		Catalyst	8.00	3.00%	0.82	60	0.02	0.59	0.11	0.00	0.00	100%	80%	0.00	0.00
Total							9.25		40.50		15.54				3.11

* Emission factors for gelcoat and resin are sum of the emission factors for styrene and MMA in page 4 of TSD Appendix and the unit is pounds per ton resin/gel coat processed.

The VOC emission factor for catalyst = 2000 lb/ton x Weight % VOC, assuming that all the VOCs contained in the catalyst evaporate.

** Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Potential VOC (lbs/hr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

Potential VOC (lbs/day) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 24 hr/day

Potential VOC (tons/yr) = Max. Usage (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs

Potential PM/PM10 (lbs/hr) = Max. Usage (lbs/hr) x (1 - Weight % VOC) x (1 - Transfer Efficiency)

Potential PM/PM10 (tons/yr) = Max. Usage (lbs/hr) x (1 - Weight % VOC) x (1 - Transfer Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) x (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) x (1 - PM/PM10 Control Efficiency) x 8760 lbs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Reinforced Plastics and Composites Open Molding Operations
HAPs Emissions
Granite Sink Top Manufacturing Line (MT-1)

Company Name: Kreider Manufacturing, Inc.
Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767
Title V: 113-15806-00036
Reviewer: ERG/YC
Date: September 3, 2002

Unit ID	Application Method	Coatings	Density (Lb/Gal)	Maximum Usage (lbs/hr)	Weight % Styrene	*Emission Factor for Styrene (lbs/ton)	PTE of Styrene (tons/yr)	Weight % MMA	*Emission Factor for MMA (lbs/ton)	PTE of MMA (tons/yr)	Weight % MEK	*Emission Factor for MEK (lbs/ton)	PTE of MEK (tons/yr)
MT-1	Gelcoat Application (airless spray guns)	Marble Gel Coat	9.90	19.69	47.30%	584	25.18	0.0%	0	0.00	0.0%	0	0.00
	Gelcoat Application (airless spray guns)	Gelcoat	10.00	6.15	30.00%	267	3.60	8.0%	120	1.62	0.0%	0	0.00
	Mechanical Atomized (spray guns)	Laminating Resin	10.80	38.52	33.50%	119	10.00	0.0%	0	0.00	0.0%	0	0.00
		Catalyst	9.00	0.82	0.00%	0	0.00	0.0%	0	0.00	3.0%	60	0.11
Total							38.77			1.62			0.11

* Emission factors for resin and gelcoat are based on "Unified Emission Factors for Opening Molding of Composites" (Jul 23, 2001) and the unit is pounds per ton resin/gel coat processed.
The emission factor for catalyst = 2000 lb/ton x Weight % HAP, assuming that all the HAPs contained in the catalyst evaporate.

Total Potential to Emit HAPs =

**40.50
tons/yr**

METHODOLOGY

HAPs emission rate (tons/yr) = Max. Usage (lbs/hr) x 8760 hr/yr x 1 ton/2000 lbs x Emission Factor (lb/ton) x 1 tons/2000 lbs

Appendix A: Emission Calculations**VOC and PM/PM10 Emissions****Spray Painting Gun EU05****Company Name: Kreider Manufacturing, Inc.****Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767****Title V: 113-15806-00036****Reviewer: ERG/YC****Date: September 3, 2002**

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
Black Paint	8.42	78.4%	14.8%	63.6%	2.61	0.066	5.36	0.92	22.14	4.04	0.11	0.48	65%	80%	0.02	0.10
Spray Paint	6.80	61.0%	0.0%	61.0%	0.50	0.046	4.15	0.10	2.29	0.42	0.02	0.09	65%	80%	0.00	0.02
Total								1.02		4.46	0.13	0.57			0.03	0.11

*Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

Appendix A: Emission Calculations**HAP Emissions****Spray Painting Gun EU05****Company Name: Kreider Manufacturing, Inc.****Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767****Title V: 113-15806-00036****Reviewer: ERG/YC****Date: September 3, 2002**

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % Ethyl Benzene	Ethyl Benzene Emissions (tons/yr)	Weight % Cobalt	Cobalt Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % Xylene	Xylene Emissions (tons/yr)
Black Paint	8.42	2.61	0.07	0.00%	0.00	0.45%	0.03	0.00%	0.00	0.00%	0.00
Spray Paint	6.80	0.50	0.05	1.00%	0.01	0.00%	0.00	6.00%	0.04	8.00%	0.05
Total					0.01		0.03		0.04		0.05

Total HAPs**0.13
tons/yr****METHODOLOGY**

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
Insignificant Natural Gas Combustion Units

Company Name: Kreider Manufacturing, Inc.
Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767
Title V: 113-15806-00036
Reviewer: ERG/YC
Date: September 3, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

11.85 (11 units combined)

103.8

	Pollutant					
	PM*	PM10*	SO ₂	**NO _x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	0.39	0.39	3.1E-02	5.19	0.29	4.36

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations

PM and HAP Emissions The Welding Operation (Insignificant Activity)

Company Name: Kreider Manufacturing, Inc.
Address City IN Zip: 405 Gerber Street, Ligonier, IN 46767
Title V: 113-15806-00036
Reviewer: ERG/YC
Date: September 3, 2002

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Oxyacetylene(carbon steel)	1	0.125		0.0055	0.0005			0.001	6.25E-05	0	0	6.25E-05

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
FLAME CUTTING												
Oxyacetylene				0.1622	0.0005	0.0001	0.0003					
Oxymethane				0.0815	0.0002		0.0002					
Plasma**				0.0039								

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	6.88E-04	6.25E-05	0.000	0.000	0.00
Potential Emissions (lbs/day)	1.65E-02	1.50E-03	0.000	0.000	0.00
Potential Emissions (tons/year)	3.01E-03	2.74E-04	0.000	0.000	2.74E-04

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick.

METHODOLOGY

Welding emissions (lb/hr) = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions (lb/hr) = (# of stations) x (max. metal thickness, in.) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Plasma cutting emissions (lb/hr) = (# of stations) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day

Emissions (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.